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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 M&J CHURCHFIELD FAMILY LIMITED
13 PARTNERSHIP d/b/a DOUBLE DICE RV
PARK,

14 Plaintiff,

15 v.

16 K&K INSURANCE GROUP, INC., d/b/a K&K
17 INSURANCE, NATIONAL CASUALTY
COMPANY,

18 Defendants.

19 Civil Action No.: 2:20-cv-00924-RFB-DJA

20 **STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR DEFENDANT NATIONAL
CASUALTY COMPANY TO RESPOND
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT
(FIRST REQUEST)**

21 Plaintiff M&J Churchfield Family Limited Partnership d/b/a Double Dice RV Park (“Double
22 Dice”) and Defendant National Casualty Company (“NCC”), by and through their respective counsel
of record, and pursuant to Local Rules IA 6-1 and 6-2, and Federal Rules of Civil Procedure Rule 6,
hereby stipulate and agree as follows:

23 WHEREAS, Double Dice filed its complaint (ECF No. 1) on May 22, 2020;

24 WHEREAS, pursuant to a written agreement and stipulation between all parties, Double Dice
25 filed its first amended complaint (ECF No. 9; herein, “FAC”) on July 16, 2020, which renders July
26 30, 2020, as NCC’s deadline to respond;

27 WHEREAS, NCC has requested, and Double Dice has agreed to, an extension of time to file

1 an answer or other responsive pleading to the FAC;

2 WHEREAS, Double Dice and NCC have agreed that NCC may file its answer or other
3 responsive pleading to the FAC on or before **Tuesday, August 4, 2020**;

4 WHEREAS, Double Dice and NCC agree that the short, three-business day extension from
5 July 30, 2020 to August 4, 2020, will not materially impact this matter, but will instead allow NCC
6 to obtain the documents and information necessary to respond to the FAC and submit the necessary
7 preliminary filings associated with NCC's first substantive appearance in this matter;

8 WHEREAS, Fed.R.Civ.P. 6(b) requires the Court to approve an extension of time for
9 Defendant to file an answer, and therefore Double Dice and NCC collectively request the Court
10 approve the stipulation, and HEREBY STIPULATE AND AGREE as set forth below:

- 11 a. This is the Parties' first stipulation for an enlargement of time to answer the First Amended
12 Complaint;
- 13 b. The Parties stipulate and agree that the deadline for NCC to file an answer, move or
14 otherwise respond to the FAC shall be extended to **August 4, 2020**; and
- 15 c. This stipulation is made in good faith and not made for purposes of delay.

16 IT IS SO STIPULATED.

18 LEVIN SEDRAN & BERMAN LLP

DUANE MORRIS LLP

20 By: /s/ Daniel Levin
Daniel Levin
21 Attorneys for Plaintiff

By: /s/ Dominica C. Anderson
Dominica C. Anderson (SBN 2988)
Tyson E. Hafen (SBN 13139)
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22 Attorneys for Defendant NCC

23 IT IS SO ORDERED:


25 UNITED STATES MAGISTRATE JUDGE

26 DATED: July 31, 2020